

Honorable John C. Coughenour

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHONG and MARILYN YIM, KELLY	)	Civil Action No. 2:18-cv-00736-JCC
LYLES, EILEEN, LLC, and RENTAL	)	
HOUSING ASSOCIATION OF	)	
WASHINGTON,	)	<b>PLAINTIFFS' FOURTH NOTICE OF</b>
	)	<b>SUPPLEMENTAL AUTHORITY</b>
Plaintiffs,	)	
v.	)	
	)	
THE CITY OF SEATTLE, a Washington	)	
Municipal corporation,	)	
	)	
Defendant.	)	

In anticipation of the upcoming hearing on motions for summary judgment, Plaintiffs wish to notify the Court of recent precedent relevant to this dispute. With respect to the issue of whether the Fair Chance Housing Ordinance is subject to strict or intermediate scrutiny, please see *IMDB.com Inc. v. Becerra*, 962 F.3d 1111, 1122 (9th Cir. 2020), attached as Exhibit A. With respect to the issue of whether the Fair Chance Housing Ordinance regulates protected speech, please see *id.* at 1123. With respect to the issue of whether the Fair Chance Housing Ordinance regulates speech, please see *Greater Philadelphia Chamber of Commerce v. City of Philadelphia*, 949 F.3d 116, 136 (3d Cir. 2020), attached as Exhibit B.

1 DATED: July 2, 2021.

2 Respectfully submitted,

3 By: s/ BRIAN T. HODGES

4 By: s/ ETHAN W. BLEVINS

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF, system which will send notification to all counsel of record.

s/ ETHAN W. BLEVINS

Ethan W. Blevins, WSBA # 48219

Attorney for Plaintiffs